

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

§

v.

§

ASIANA CHRISTINE WILLIAMS

§


3:23-CR-27

§

FILED
SCRANTON

NOV 19 2024

Per


DEPUTY CLERK

MOTION TO DISMISS

DEFENDANT ASIANA CHRISTINE WILLIAMS ("Ms Williams"), by and through
pro se hereby files this MOTION TO DISMISS, and avers as follows:

1.) Ms. Williams is an adult individual who is currently housed at
Lackawanna County Prison.

2.) Defendant Ms. Williams argues that had it not been for her
attorney CJ Rotteville's lack of work that fell below the bar, and
ineffective counsel, their would have been a different outcome.

3.) Ms. Williams argues that she received ineffective counsel
and excuseable neglect.

4.) CJ Rotteville failed to adequately prepare for trial, he
failed to review all twelve waves of discovery before allowing
trial to start.

5.) CJ Rotteville failed to subpoena individuals to testify
during trial who could have produced evidence.

6.) CJ Rotteville refused to use the discovery to engage in
effective cross-examination.

7.) CJ Rotteville lied to a Federal Judge and told him that
Ms. Williams was ready for trial when she was nowhere
near ready for trial.

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8.) CJ Rotteville committed fraud on the court by providing a letter and saying it was signed by Ms Williams, to the courts. Ms. Williams did not sign or write anything stating that she didn't want any of her motions adopted or that she was ready for trial. CJ was ordered by Judge Robert Mariani to get a letter from Ms. Williams stating she didn't want any of her motions adopted and that she was ready to start trial on August 5th 2024. CJ

9.) CJ gave a letter to the judge and because of this Ms. Williams was forced to go to trial with an attorney who had premature knowledge about her case.

10.) CJ Rotteville was assigned to Ms. Williams case four months prior to her case but because he was working with another client (Kevin Jones) he neglected Ms. Williams completely, all the way up until two weeks before trial. There's proof (via email) of CJ telling defendants family "he feels bad for not communicating and that he hasn't had any time for Ms. Williams because he's been working with another client". It was only after going to trial two times (after Kevin Jones mistrial) did CJ make time for Ms. Williams, which was two weeks before her trial was scheduled. Ms. Williams tried numerous times to contact CJ to ask him to come see her and to put in a motion to continue her trial date along with other motions, to no avail.

After months of trying to reach CJ with no luck Ms. Williams went as far as giving her family authorization to put in motions for her on her behalf, which got denied because "her lawyer" who was missing in action didn't file them and refused to

adopt them.

CJ showed up two weeks before trial refusing to adopt any of Ms Williams motions that were filed, also refusing to go over any of Ms Williams motions with her and explain why he thought they were frivolous. He refused to do anything Ms Williams asked him to do, including ask for more time to prepare for trial. He told defendant that "Judge would not give her more time and she was out of options on counsel, if it wasn't him representing her then she would have to represent herself during trial. He never once asked for more time. How can a motion for an extension of more time be frivolous.

11.) Even after losing trial Ms. Williams asked CJ Rotteville to put in a notice of appeal along with other post trial motions, and he refused saying "it was a pretty clean trial".

12.) The eleventh Circuit has held that a lawyer who disregard instructions from his client to appeal has acted in a manner that is professionally unreasonable. (Armstead v. United States, 2024 U.S Dist) (§ 2255 28 U.S.C (F)(1))

13.) Defendant Ms. Williams respectfully asks the United States District Courts to grant this motion to dismiss.

Respectfully Submitted

x Asiana Williams

1371 N. Washington Ave

SCRANTON PA 18509

Lockawanna County Prison

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Certificate of Service

Asiana C Williams, hereby certifies that on November 7 2024,
she served the foregoing Motion to Dismiss via this court's
Electronic Filing/Mailing System.

Respectfully Submitted

x Asiana Williams

Lackawanna County Prison

1571 N. Washington Ave

Scranton PA 18509